

REMARKS

The Section 112 rejection that the claim must indicate, in the preamble, the type of method involved is noted. However, there is nothing in any of the rules or the statutes that can be found that requires such preambles. Generally, preambles are not even limitations in the claims, although they sometimes may be, and, therefore, there is no basis to conclude that the claim is somehow vague because the preamble is non-specific. The claim clearly tells what it covers. It does not matter what type of method it is as long as the steps are clearly set forth. In short, there is no basis for an assertion that the preamble is too broad.

With respect to the objection that a “solution” and a “cleaning solution” are confusing, it is noted that this same language has been in the claims throughout prosecution. The material added to claim 1 was formerly in dependent claim 4 and existed without objection. It is respectfully submitted that a cleaning solution and a solution may be the same or different. There is no reason to limit them in any way. The fact that “a” is used before “solution” makes it perfectly clear that “a solution” need not be the same solution as “a cleaning solution” in the preceding paragraph. Therefore, reconsideration is requested.

Finally, the office action contends that the cited reference teaches spraying a solution at the interface between the rotating brushes and the wafer. The office action suggests that Figure 3B shows such an interface, despite the fact that the rotating brushes and the wafer are spaced from one another. There simply cannot be an “interface” between two things that do not touch. For example, Dictionary.com defines “interface” as a surface forming a common boundary between adjacent regions, bodies, services, or phases.

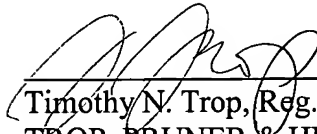
There is an interface between the brushes and the wafer in Figure 3A but then, of course, there is no spraying. The cited reference simply does not teach spraying at the interface between the wafer and the brushes. The assertion that it is clear that there is an interface is puzzling since the Applicants can argue strongly that there is absolutely no such interface.

If the Examiner is to maintain the rejection based on there being an interface, the Examiner is respectfully requested to make of record what that common boundary is. The boundary between the air and the brush might be an interface if one were to stretch the definition, but it still would not be an interface between the brush and the wafer.

Reconsideration is requested.

Respectfully submitted,

Date: February 15, 2005



Timothy N. Trop, Reg. No. 28,994
TROP, PRUNER & HU, P.C.
8554 Katy Freeway, Ste. 100
Houston, TX 77024
713/468-8880 [Phone]
713/468-8883 [Fax]

Attorneys for Intel Corporation